Exhibit "7"

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
	X
RUBY FREEMAN and WANDREA' MOSS	No. 24-cv-6563(LJL)
Plaintiffs,	No. 24-mc-353(LJL)
-against-	Defendants' Second Amended
RUDOLPH W. GIULIANI	Response to Plaintiffs' First Set of Interrogatories
Defendant.	X
	- -

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33.3 of the Southern District of New York, Defendant Rudolph W. Giuliani submit the Second Amended Responses to Plaintiffs' First Set of Interrogatories.

SECOND AMENDED RESPONSES TO INTERROGATORIES

<u>INTERROGATORY NO. 4:</u> Identify any financial, medical, or legal professional or firm whom you have consulted during the period of January 1, 2020, through the present.

SECOND AMENDED RESPONSE: It would be impossible for me to answer this interrogatory as I am unable to identify all of the financial, medical, or legal professionals or firms whom I have consulted with during the most stressful time of my life, which was during the period of January 1, 2020, through the present who I have consulted with during the preceding five years. I have attorney-client privileges, doctor-patient privileges which I do not waive. The question of who I consulted with in 2020 and thereafter is abusive. I have attorney-client privileges of attorneys that I consulted with on behalf of former clients of mine which I have no ability to waive. This is just one example of the abusive discovery carried out by

INTERROGATORY NO. 8: Identify all email accounts, messaging accounts, and phone numbers that You have used during the period January 1, 2023, through the present.

SECOND AMENDED RESPONSE:

Email: TruthandJustice4U@protonmail.com

Messaging accounts: I do not understand what Messaging account is nor is it proper to ask for every messaging accounts.

Telephone numbers: The telephone number of the former Mayor of the City of New York and former United States Attorney who had death threats should remain undisclosed. There is no valid reason for the disclosure of the Defendant's confidential telephone number as it will not prove or disprove the fact that at all relevant times, the Defendant is and was a citizen of, a resident of and a domiciliary of the State of Florida prior to the filing of the Judgment in the United States District Court for the Southern District of New York which was filed on August 5, 2024.

Dated: December 17, 2024 Staten Island, New York

s/ joseph m. cammarata/

Joseph M. Cammarata, Esq. Cammarata & De Meyer, P.C. 456 Arlene Street Staten Island, New York 10314 Telephone: 718-477-0020 Email: joe@cdlawpc.com

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	V
RUBY FREEMAN and WANDREA' MOS	
Plaintiffs,	,
-against-	Defendants' verification of Defendant's response to Plaintiffs' First Set of Interrogatories
RUDOLPH W. GIULIANI	
Defendant.	X
Verif	fication
stated in the foregoing Defendant's Second	res under penalties of perjury that the facts Amended Responses to Plaintiffs' First Set of est of my knowledge, information and belief.
Dated: December 17, 2024	Signed by: Rudolph W. Giuliani 98627E812D284EE
	Rudolph W. Giuliani